



Cynthia Vodopivec
Dynergy Midwest Generation, LLC
Luminant
6555 Sierra Dr.
Irving, TX 75039

January 31, 2023

Mr. Richard Huggins
Energy Recovery and Waste Disposal Branch
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Baldwin Power Plant Alternative Closure Demonstration – Update to Closure Plan

Dear Mr. Huggins:

Dynergy Midwest Generation, LLC (DMG) is providing the U.S. Environmental Protection Agency (“EPA”) with this update to the closure plan associated with the Baldwin Power Plant located near Baldwin, Illinois. See 40 C.F.R. § 257.102(b)(3)(i).

As detailed in the alternative closure demonstration submitted to EPA on November 30, 2020, DMG requested an extension pursuant to 40 C.F.R. § 257.103(f)(2) so that the Bottom Ash Pond could continue to receive CCR and non-CCR wastestreams after April 11, 2021, and complete closure no later than October 17, 2028. On January 11, 2022, EPA determined that the alternative closure demonstration was complete, thus continuing to toll the deadline to cease receipt of waste at the Bottom Ash Pond.

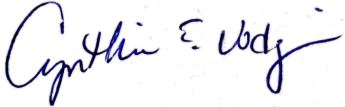
Following the submittal of the alternative closure demonstration, in April 2021 new Illinois state rules governing the management of CCR in Illinois became effective. In accordance with those new rules, we are in the process of developing various documents regarding the closure of the Bottom Ash Pond. On January 31, 2023, we posted a preliminary construction permit application and closure plan for the Bottom Ash Pond on our Illinois CCR website. We will post a further refined draft construction permit application and closure plan in May 2023 in advance of a public meeting we plan to hold in June 2023. We will submit the final construction permit application and closure plan to Illinois EPA by August 1, 2023.

Accordingly, we are updating our closure plan under 40 C.F.R. § 257.102 to incorporate the proposal posted to our Illinois CCR website, which will involve consolidating the ash footprint. DMG’s new proposed closure plan contains relevant information to EPA’s review of DMG’s alternative closure demonstration and reflects the manner in which the Bottom Ash Pond will be closed if approved by Illinois EPA. The preliminary draft construction permit application, which includes the proposed new closure plan, will be posted to Luminant’s public CCR website, along with this letter. This submission should be included by EPA as an update to the administrative record for the Baldwin alternative closure demonstration that is currently pending. We will further update EPA if changes are made to the closure permit application prior to the final submittal to Illinois EPA by August 1, 2023.

An electronic PDF of this letter is being submitted to Richard Huggins, Frank Behan and Lydia Anderson via email. Additionally, this letter and the draft application will be posted to Luminant’s public CCR

website: www.luminant.com/ccr/. If you have any questions regarding this submittal, please contact me or Phil Morris at 618-343-7794 or phil.morris@vistracorp.com.

Sincerely,

A handwritten signature in black ink that reads "Cynthia E. Vodopivec". The signature is written in a cursive style with a large initial 'C' and a distinct 'E'.

Cynthia Vodopivec
SVP – Environmental, Health & Safety